

March 12, 2020

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Application of Duke Energy Carolinas, LLC for Approval of Demand-Side Management and Energy Efficiency Rider 12, Increasing Residential Rates and Decreasing Non-Residential Rates;
Docket No. 2020-83-E**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (SC Bar No. 80073)
Carrie Harris Grundmann

Derrick Price Williamson
Spilman Thomas & Battle, PLLC
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Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-83-E

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| IN RE: |) | |
| |) | |
| Application of Duke Energy Carolinas, LLC |) | PETITION TO INTERVENE OF |
| for Approval of Demand-Side Management |) | WALMART INC. |
| and Energy Efficiency Rider 12, Increasing |) | |
| Residential Rates and Decreasing Non- |) | |
| Residential Rates |) | |

Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On March 2, 2020, Duke Energy Carolinas, LLC ("Company" or "DEC"), filed an Application for approval of Rider 12, Demand-Side Management ("DSM") and Energy Efficiency ("EE") for 2021 ("Application"). The Application was filed pursuant to S.C. Code Ann. Section 58-37-20, 10 S.C. Code. Reg. 103-819 and 823, the Rule of Practice and Procedure of the Public Service Commission of South Carolina.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, AR 72716.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of DEC. Walmart has approximately 37 facilities in South Carolina that are served by DEC, which include Walmart Supercenters, Sam's Clubs, gas stations, one return center, and one distribution center. Walmart purchases

approximately 122 million kWh annually from DEC. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to DEC's electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina. Further, Walmart is dedicated to its own investment in DSM and EE and therefore is very interested in this case and has participated in similar cases in the past.

4. In addition, Walmart believes that DEC should explore modifying DEC's opt-out timing and procedures so that they are consistent with those of Duke Energy Progress in South Carolina.

5. As such, Walmart has a direct and substantial interest in the outcome of this proceeding. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from DEC pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

6. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Grundmann be added jointly to the service list. Walmart may cause to be filed a motion for Mr. Williamson and/or Ms. Grundmann to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Mr. Williamson and Ms. Grundmann be

added to the official service list as attorneys authorized to accept service of papers in this proceeding.

7. This Petition to Intervene is timely filed as interventions are due by June 1, 2020, per Notice of the Commission.

WHEREFORE, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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Counsel to Walmart Inc.

Dated: March 12, 2020

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2020-83-E

IN RE:

Application of Duke Energy Carolinas, LLC
for Approval of Demand-Side Management
and Energy Efficiency Rider 12, Increasing
Residential Rates and Decreasing Non-
Residential Rates

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: March 12, 2020